

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRISURA INSURANCE COMPANY,

Plaintiff,

–against–

Civil Action No. 1:23-cv-11053-GWH-JW

BIGHORN CONSTRUCTION AND
RECLAMATION, LLC; BIGHORN
INVESTMENTS AND PROPERTIES, LLC;
BIGHORN SAND & GRAVEL LLC;
BRIDGELINK COMMODITIES LLC;
BRIDGELINK ENGINEERING LLC;
BRIDGELINK INVESTMENTS, LLC;
BRIDGELINK RENEWABLE ENERGY
DEVELOPMENT LLC; BRIDGELINK
RENEWABLE ENERGY INVESTMENTS LLC;
INTERMOUNTAIN ELECTRIC SERVICE, INC.;
COLE WAYNE JOHNSON; CORD HENRY
JOHNSON; CASSIE HAMILTON,

Defendants.

**NOTICE OF MOTION FOR
ADDITIONAL TIME TO SERVE
SUMMONS AND AMENDED
COMPLAINT ON TWO
DEFENDANTS**

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PLEASE TAKE NOTICE that upon the accompanying Affirmation of Dennis O’Neil Cowling dated March 15, 2024, together with the Exhibits thereto, all of the prior pleadings and proceedings heretofore had herein and the accompanying memorandum of law, Plaintiff, Trisura Insurance Company (“Trisura”), by its attorneys McElroy, Deutsch, Mulvaney & Carpenter LLP will move this Court before the Honorable Gregory H. Woods, U.S.D.J., Southern District of New York, located at 500 Pearl Street, Courtroom 12C, New York, New York, on the 8th day of April, 2024, at 9:30 o’clock in the forenoon of that day or at such other time and place as counsel can be heard for an Order pursuant to Rules 4(m) and 6(b)(1) of the Federal Rules of Civil Procedure for and Order granting Plaintiff an additional ninety (90) days to serve the Summons and Amended

Complaint on Cole Wayne Johnson, and if necessary reserve Intermountain Electric Service, Inc., together with such other and further relief as may be just and proper.

No previous request has been made for the relief requested herein.

No other parties have appeared herein.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 6 of the Federal Rules of Civil Procedure, any answering papers, if any, shall be served on the undersigned at least seven (7) days prior to the return date of this motion.

Dated: New York, New York
March 15, 2024

McElroy, Deutsch, Mulvaney & Carpenter, LLP
Attorneys for Defendant Trisura Insurance Company

By: /s/ Dennis O'Neil Cowling
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